

May 29, 2020

VIA CM/ECF

Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201



Re: *Bing Guan, et al. v. Chad F. Wolf, et al.*,
Civil No. 19-CV-6570 (PKC/JO)

LEGAL DEPARTMENT

National Office
125 Broad Street,
18th Floor
New York, NY 10004
Tel: (212) 549-2644
Fax: (212) 549-2644
aclu.org

Susan N. Herman
President

Anthony D. Romero
Executive Director

Richard Zacks
Treasurer

Dear Judge Chen,

Plaintiffs' counsel respectfully request a 21-day extension of time to serve their brief in opposition to Defendants' motion to dismiss, served on Plaintiffs on May 21, 2020. Per this Court's minute order dated April 3, 2020, Plaintiffs are due to serve their opposition brief by June 26, 2020. Plaintiffs respectfully request the desired extension of time due to the press of other business, including litigation deadlines in other cases. This is the Plaintiffs' first requested extension of time to respond to this motion.

We have conferred with counsel for the Defendants and have been authorized by them to inform the Court that Defendants do not oppose the requested extension.

If our request is approved, the Plaintiffs' deadline to serve our opposition brief would be July 17, 2020, and the Defendants' deadline to serve their reply and file the fully-briefed motion would be August 14, 2020.

Respectfully submitted,

s/ Esha Bhandari

Esha Bhandari
Scarlet Kim
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION
125 Broad Street,
18th Floor
New York, NY 10004
(212) 549-2500 (phone)
(212) 549-2583 (fax)
ebhandari@aclu.org
scarletk@aclu.org

Antony Gemmell
Christopher Dunn
NEW YORK CIVIL LIBERTIES
UNION FOUNDATION
125 Broad Street,
19th Floor
New York, NY 10004
(212) 607-3300 (phone)
(212) 607-3318 (fax)
agemmell@nyclu.org
cdunn@nyclu.org

Mitra Ebadolahi
Sarah Thompson
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF SAN DIEGO &
IMPERIAL COUNTIES
P.O. Box 87131
San Diego, CA 92138-7131
(619) 232-2121 (phone)
(619) 232-0036 (fax)
mebadolahi@aclusandiego.org
sthompson@aclusandiego.org

Counsel for Plaintiffs

cc: By CM/ECF

F. Franklin Amanat
Ekta R. Dharia
Assistant U.S. Attorneys